

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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U.S. SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiffs,

**Docket No.: 18-CV-9284-MCA-MAH**

-against-

**NOTICE OF MOTION**

PAUL PARMAR, et. al.

Defendants.

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PLEASE TAKE NOTICE, that upon the associated Memorandum of Law, the Defendant  
PAUL PARMAR shall move the Court, at a time and date to be set by the Court, for an order:

1. Pursuant to Fed.R.Civ.P. 12(b)(6), dismissing the Complaint for failure to state a plausible cause of action;
2. Pursuant to Fed.R.Civ.P. 12(b)(7) and 19, dismissing the Complaint for failure to join three necessary parties, Bank of America, Chinh Chu and Truc To; and
3. Such other and further relief as the Court deems appropriate.

Respectfully submitted,



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